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July 15, 2015

BY FAX (973-776-7865)

The Honorable Cathy L. Waldor
United States Magistrate Judge
Martin Luther King Building
& United States Courthouse
50 Walnut Street
Newark, New Jersey 07101

SO ORDERED

s/Cathy L. Waldor
Cathy L. Waldor, U.S.M.J.

Date: 7/16/15 9:20am (EST)

Re: United States v. John Bennett, No. 09 Cr. 656 (SDW)

Dear Judge Waldor:

On behalf of our client John Bennett, we write to amend and correct the request your Honor granted yesterday in two respects. First, we have learned from Pretrial Services that Mr. Bennett will need to have his ankle monitoring device removed during the course of his trip to New York to meet with counsel. We therefore request that your Honor authorize Pretrial Services to remove Mr. Bennett's ankle monitor before he leaves Palm Desert for New York on Monday, July 20, 2015, and to put it back on upon his return to Palm Desert.

Second, due to a misunderstanding by counsel, we asked the Court to allow Mr. Bennett to report to his Immigration and Customs Enforcement Officer today, July 15, 2015, instead of the actual reporting date, tomorrow, July 16, 2015. We write to request that your Honor amend the Court's July 14, 2015 order allowing Mr. Bennett to leave his home at 7:00am to report to his ICE officer in San Bernardino to be in effect for Thursday, July 16, 2015. Moreover, we ask that this request be granted *nunc pro tunc* if your Honor is not able to address it before Mr. Bennett must leave his home tomorrow morning.

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

The Honorable Cathy L. Waldor

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Due to the time-sensitivity of this request, we are submitting this letter though we have not yet been able to learn the government's position. Thank you for your attention to this matter.

Respectfully submitted,



Jacob W. Mermelstein

cc: Helen Christodoulou, Esq. (by email)
Mikhail Vanyo, Esq. (by email)
Daniel Tracer, Esq. (by email)
Ms. Barbara Hutchinson, Pretrial Services Officer (by email)
Ms. Brenda Orantes, Pretrial Services Officer (by email)